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May 6, 2024

Via ECF

Honorable Vincent F. Papalia  
50 Walnut Street  
Newark, New Jersey 07102  
Courtroom 3B

Reference: Elizabeth M. Convery; 22-16516-VFP

Dear Judge Papalia:

I am writing to provide a status concerning issues resolved and potential issues that may arise as they concern Ms. Convery during the remainder of this Chapter 7 proceeding. At the forefront, is the sale motion scheduled to be heard before you honor tomorrow, May 7, 2024. Ms. Convery has objected to the proposed sale order insofar as it saddles her alone with responsibility to ensure the martial home is left in “broom clean” condition.

Ms. Convery is diligently working on vacating the property. Yet, she is uncertain if she will be able to be out before the June 7<sup>th</sup> agreed upon date and has asked me to request that the deadline be extended to the 10<sup>th</sup> to allow the weekend to complete the move. Ms. Convery has not yet found a new residence. She is communicating with a local organization to assist her in finding housing for her and her adult child.

Ms. Convery represented herself *pro se* in adversary proceeding 23-01013-VFP Mooney et al v. Convery which has now concluded with a judgment of non-dischargeability. Ms. Convery is a party to a matrimonial action in which she is represented by Laura Nunnink, a partner at November

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\*Meeting location - by appointment only.

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May 6, 2024

& Nunnink, LLC. I am informed that the matrimonial matter is in its early stages, having had its initial case management hearing last week.

Foreseeable events in this bankruptcy include addressing potential non-exempt equity in Ms. Convery's vehicle, consummation of the real estate sale and distribution of her homestead exemption, and completion of post-filing debtor education and filing of a certificate of completion.

I have instructed my office to follow up with Ms. Convery concerning completion of the debtor education course and filing of the certificate. Ms. Convery has been in direct contact with the Chapter 7 Trustee's counsel concerning the vehicle she wishes to retain, and my office has filed amended schedules adjusting exemptions as appropriate.

I have informed Ms. Convery of the expected process from this point forward. I respectfully submit that my firm's continued representation of her is not necessary and request the court to enter the order authorizing our withdrawal as counsel. Notwithstanding our withdrawal, I will commit to filing her credit counseling certificate and being reasonably available to her to provide general guidance.

Yours truly,

SCURA, WIGFIELD, HEYER  
STEVENS & CAMMAROTA, LLP

By: /s/ David Stevens  
David Stevens, Esq.